

June 3, 1998

Mr. Larry Greene
Air Pollution Control Officer
Yolo-Solano Air Quality Management District
1947 Galileo Court, Suite 103
Davis, CA 95616

Re: Proposed Title V Operating Permit No. F-97-02, Leer West, Inc.

Dear Mr. Greene:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to review the Yolo-Solano Air Quality Management District's (District) proposed Title V permit for Leer West, Inc. (No. F-97-02). In accordance with 40 CFR § 70.8 (c), and District Rule 3.19, the EPA has reviewed the proposed permit during our 45-day review period.

In general the proposed permit establishes enforceable conditions with adequate monitoring, record keeping and reporting requirements. However, per discussions between EPA and District staff on May 11, 1998, the District has agreed there are several issues and corrections that need addressing before the permit may be issued. We have enclosed our comments for your review.

Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening for cause) the expiration of both EPA's review period and the public petition period does not compromise EPA's authority to take such measures. The terms contained in this permit are specific to the facility and do not create conditions for the use, operation, or reliance of any other party.

We appreciate your attention to our comments and look forward to working with you to resolve any outstanding issues. If you have any questions concerning our comments, please do not hesitate to contact John Walser of my staff at (415) 744-1257.

Sincerely,

Matt Haber
Chief, Permits Office

enclosure

cc: Ray Menebroker, CARB
Mel McCall, Leer West Inc.

ENCLOSURE

EPA Comments on the Proposed Title V Operating Permit for Leer West, Inc.

1. *Emission Limitations and Operating Requirements* -- In Section IV. - Emission Limitations and Operating Requirements of the proposed permit, both Condition B (Gel Booths S-1, S-2) and Condition C (Lamination Booth S-3) state that manufacturer certification that the resin complies with South Coast Air Quality Management District (SCAQMD or “South Coast”) Rule 1162 shall be accepted as demonstration of compliance with the monomer content limit (less than 35% by weight as determined by using USEPA Reference Method 24) and the vapor suppressant resin limit. EPA is concerned that referencing another district’s rule in your proposed permit may be problematic, since the District has no legal or oversight authority regarding SCAQMD rules and subsequent actions related to those rules. EPA understands that the permits for these units define Best Available Control Technology (BACT) as the limits listed in the SCAQMD rule. However, EPA recommends that the District delete this reference from both conditions IV.B and IV.C on page 10 of the proposed permit. If the District incorporates by reference South Coast’s rule, the specific version and date of adoption of the rule must be included. If possible, the certification of compliance should be connected to specific District rules and limitations that are equivalent to the requirements in SCAQMD Rule 1162 (e.g., District Rule 2.30 - Polyester Resin Operations). Please adjust these conditions of the permit appropriately.
2. *Particulate Matter* -- In the General Prohibitions section of the permit, Condition 3 states that particulate matter emissions in excess of 0.3 grains per standard cubic foot of exhaust volume are prohibited. The permit evaluation (Page 9, Rule 2.11- Compliance Status) states that “based on engineering emission evaluations, Leer West Inc. does not operate equipment that could potentially violate this rule and is in compliance.” As agreed to by Mr. Steve Speckert of your staff, please provide the evaluation that clearly demonstrates compliance with this limit. The evaluation, including emission factor and emission estimate methodology, should demonstrate that your worst case emissions will not exceed the 0.3 grains per cubic foot limit. Similar to previous engineering evaluation analyses, the District must provide an analysis of worst-case emissions to demonstrate that this is true, or provide monitoring to assure compliance with this limit. If demonstrated satisfactorily, no testing, record keeping or monitoring for particulate matter would be required.
3. *MACT Standard* -- It is our understanding that the facility is not a major source of hazardous air pollutants (HAPs). There is no listing in the Yearly Facility Emission Summary Table on Page 7 of the permit evaluation for HAP emissions. Therefore, based on the information provided, the source does not appear to be subject to the requirement for Maximum Control Technology (MACT) standards (40 CFR 63, Subpart W). However, EPA is concerned that Leer West Inc., a manufacturer of fiberglass camper shells, may be a significant source of styrene emissions from the polyester resin materials or formulations. As agreed to by Mr. Speckert, please revise the permit by adding a discussion to the General Requirements section of the permit clarifying this.
4. *Emission Limitations and Operating Requirements* -- In the Emission Limits and Operating Requirements Applicable to All Units section of the permit, Condition IV. A. 3 states:

“emissions of VOC shall be determined based on production of camper shell units using emission factors and calculations approved by the District.” EPA suggests revising this language in the permit to state that emissions may be determined by using reliable emissions or test data and calculations methods approved by the District and the Administrator. As agreed to by Mr. Speckert, please provide information regarding how emission factors and calculation methods will be determined for VOC emissions.

5. *Rule 3.4 New Source Review* -- References to Rule 3.4 New Source Review that mention “pending final EPA SIP approval” can now be updated to reflect the final EPA SIP approval date of September 5, 1997 (62 FR 36214). Please correct the proposed permit and permit evaluation to reflect this approval date as needed.